

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO**

MELODY JOY CANTU AND DR. RODRIGO
CANTU,

5:20-CV-0746 JKP – HJB

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC,

Defendants.

Third Continuance Request On Consent Of All Parties

Plaintiffs Dr. Rodrigo Cantu and Melody Joy Cantu in their third continuance request, and Co-Defendants Dr. Sandra Guerra and Digital Forensics Corporation, LLC, through their undersigned attorneys, hereby stipulate:

1. The last filed motion in this matter is Plaintiffs' Reply in Support of Their Motion to Dismiss Dr. Sandra Guerra's Amended Counterclaims.
2. The parties are currently going through discovery. The ADR Report has been filed on March 15, 2021 (Docket. No. 44). On May 17, 2021 expert designations are due.
3. On January 30, 2021 Plaintiff Melody Joy Cantu had a medical emergency, she was thrown off a horse. Mrs. Cantu is still dealing with pain management and recovery the past few months. She continues to be in immense pain and repeatedly visits doctors and the hospital to deal with issues stemming from the event.
4. The previous two continuances were requested to allow her proper recovery time. As of May 5, 2021, Mrs. Cantu's doctors advised her to remain at home for at least another month.
5. However, Parties are exploring the possibility of mediation and plan to use the continuance to communicate with each other regarding mediation.
6. Plaintiffs' counsel reached out to opposing counsel for both Co-Defendants and had a good faith conference regarding their request for a continuance. All parties are in agreement to a 30-day continuance. After which, they will reconvene to review whether another continuance is necessary.
7. All parties are in agreement and stipulate to a sixty-day continuance of our discovery deadlines. With the new deadlines as follows:

- June 16, 2021: Designation of Experts by Parties Asserting Claims
- July 1, 2021: Responses to Settlement Offers from Opposing Parties
- July 16, 2021: Last day to Amend/Supplement Pleadings, and Joinder
- Aug 2, 2021: Designation of Experts by Parties Resisting Claims
- September 15, 2021: Discovery Deadline
- September 29, 2021: Joint Report on Settlement Negotiations
- October 14, 2021: Last Day to File Dispositive Motions

Dated: May 14, 2021

Stipulated and respectfully submitted,

/s/ Tor Ekeland

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Dr. Rodrigo Cantu*

Certificate of Service

I certify that on this 14th of May 2021, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/ Tor Ekeland